

# **EXHIBIT 2**

1 Page 1

2  
3 UNITED STATES DISTRICT COURT  
4 SOUTHERN DISTRICT OF NEW YORK

5 CASE NO.: 24-cv-6563 (LJL)

6 RUBY FREEMAN and WANDREA' MOSS,

7 Plaintiffs,

8 -vs-

9 RUDOLPH W. GIULIANI,

10 Defendant.

11 West Palm Beach Marriott  
12 1001 Okeechobee Blvd.  
13 West Palm Beach, FL 33401

14 DATE: Friday, December 27, 2024

15 TIME: 9:12 a.m. - 5:28 p.m.

16 VIDEO DEPOSITION OF RUDOLPH W. GIULIANI

17  
18  
19  
20  
21 Taken on behalf of the PLAINTIFFS before  
22 Jennifer L. Bush, RPR, Notary Public in and for the State  
23 of Florida at Large, pursuant to Notice of Taking  
24 Deposition in the above cause.

		Page 2	
1	APPEARANCES		
2	APPEARING ON BEHALF OF THE PLAINTIFFS:		
3			THE VIDEOGRAPHER: We are now on the record
4	Aaron Nathan, Esquire		on -- at 9:12 a.m. on December 27th, 2024.
5	Joanna Lambert, Esquire		Please note that the microphones are
6	Meryl Governski, Esquire		sensitive and may pick up whispering and private
7	Willkie Farr & Gallagher LLP		conversations.
8	1875 K Street NW		6 Please mute your phones at this time.
9	Washington, DC 20006		7 Audio and video recording will continue to
10	202-303-1016		8 take place unless all parties agree to go off the
11	Anathan@willkie.com		9 record.
12	APPEARING ON BEHALF OF THE DEFENDANT:		10 This is Media Unit 1 of the video-recorded
13			11 deposition of Rudolph W. Giuliani, taken by
14	Joseph M. Cammarata, Esquire		12 counsel for plaintiff in the matter of Ruby
15	Cammarata & DeMeyer PC		13 Freeman versus (sic) Wandrea' Moss versus Rudolph
16	456 Arlene Street		14 W. Giuliani.
17	Staten Island, NY 10314		15 My name is Daniel Ragland, the videographer
18	718-447-0020		16 representing Veritext. The court reporter is
19	Joe@cdlawpc.com		17 Jennifer Bush from the firm Veritext.
20	APPEARING ON BEHALF OF ANDREW GIULIANI:		18 Will counsel please announce their
21	Scott B. McBride, Esquire		19 appearances for the record, after which the court
22	Lowenstein Sandler LLP		20 reporter will swear in the witness.
23	One Lowenstein Drive		21 MR. NATHAN: Aaron Nathan, Willkie Farr &
24	Roseland, New Jersey 07068		22 Gallagher. I am counsel for plaintiffs.
25	973-597-6136		23 MS. LAMBERTA: Joanna Lambert, Willkie
1	Also Present:		24 Farr & Gallagher. I am counsel for plaintiffs.
2	Daniel Ragland, Videographer		25 MS. GOVERNNSKI: Meryl Governski, Wilkie
		Page 3	
1	INDEX OF PROCEEDINGS		
2			Page 5
3	VIDEO DEPOSITION OF RUDOLPH W. GIULIANI		
4	DIRECT EXAMINATION BY MR. NATHAN:		
5		5	
6	CERTIFICATE OF NOTARY PUBLIC	347	1 Farr & Gallagher, also counsel for plaintiffs.
7	ERRATA SHEET	348	2 MR. CAMMARATA: Joseph Cammarata, Cammarata
8	CERTIFICATE OF OATH OF WITNESS	344	3 & DeMeyer PC, attorney for Rudolph W. Giuliani.
9	CERTIFICATE OF REPORTER	345	4 MR. MCBRIDE: Scott McBride, Lowenstein
10	READ LETTER	346	5 Sandler for intervener, Defendant Andrew Giuliani.
			6 WHEREUPON,
			7 RUDOLPH W. GIULIANI,
			8 called as a witness on behalf of the PLAINTIFFS, after
			9 having been first duly sworn, was examined and testified
			10 as follows:
			11 THE WITNESS: I do.
			12 DIRECT EXAMINATION
			13 BY MR. NATHAN:
			14 Q. Mr. Mayor --
			15 A. Yes.
			16 Q. -- thank you for making time for us today.
			17 I know you have done this before. I apologize for the
			18 boring introduction, but I've got to run through some
			19 housekeeping.
			20 Could you please state your full name for
			21 the record?
			22 A. Rudolph, R-u-d-o-l-p-h, W., middle initial
			23 for William, Giuliani, G-i-u-l-i-a-n-i.
			24 Q. Thank you.
			25 You've been deposed before, right?

<p>1 active.</p> <p>2 Q. I understand. And you take each of them</p> <p>3 seriously, right?</p> <p>4 A. As serious as I can, being inundated.</p> <p>5 There are only 24 hours in a day.</p> <p>6 Q. When you get a discovery request from the</p> <p>7 plaintiffs, you do your best to answer it completely and</p> <p>8 fully?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Okay. And you answered interrogatories in</p> <p>11 this case under oath?</p> <p>12 A. If that's what it says.</p> <p>13 Q. Okay. When you receive a document that</p> <p>14 asks for your responses under oath, you understand that</p> <p>15 that means that your answers are sworn?</p> <p>16 A. Yes, sir. At the bottom when I sign it,</p> <p>17 that's what it says, yeah.</p> <p>18 Q. Okay. And you answered the interrogatories</p> <p>19 in this case truthfully?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Okay. Whenever you are under oath, you</p> <p>22 tell the truth?</p> <p>23 A. I do.</p> <p>24 Q. And generally when you testify in court,</p> <p>25 you tell the truth?</p>	<p>Page 14</p> <p>1 Q. Okay. You'd make an amended filing?</p> <p>2 A. Well, I would tell my -- I would tell my</p> <p>3 lawyer if it came up. Usually somebody else would</p> <p>4 discover it, and I would correct it.</p> <p>5 Q. Okay. All right. Well, as -- as we go</p> <p>6 forward today, we're going to be talking a lot about two</p> <p>7 different apartments. I just want to make sure we can</p> <p>8 understand ourselves and each other clearly.</p> <p>9 So if I say your Palm Beach condo or your</p> <p>10 condo, will you understand that I'm referring to the</p> <p>11 condo apartment at 315 South Lake Drive in Palm Beach,</p> <p>12 Unit 5-D?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Okay. And you don't own any other</p> <p>15 condominium apartment in Florida?</p> <p>16 A. I do not.</p> <p>17 Q. Okay. If I talk about your New York</p> <p>18 apartment, will you understand that I'm referring to the</p> <p>19 co-op apartment at 45 East 66th Street, apartment 10-W in</p> <p>20 New York, New York?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And you don't own any other apartment in</p> <p>23 New York?</p> <p>24 A. I do not.</p> <p>25 Q. Okay. So if we get mixed up or if you</p>
<p>Page 15</p> <p>1 A. Always when I testify in court. I tell the</p> <p>2 truth to the best of my ability.</p> <p>3 Q. Okay. And when you testify in a</p> <p>4 deposition, you tell the truth?</p> <p>5 A. Again, to the best of my ability.</p> <p>6 Q. When you file documents in court, you also</p> <p>7 tell the truth?</p> <p>8 MR. CAMMARATA: Objection.</p> <p>9 THE WITNESS: Again, to the best of my</p> <p>10 ability, yes.</p> <p>11 BY MR. NATHAN:</p> <p>12 Q. When you say "to the best," is there a</p> <p>13 reason that you would be unable to answer truthfully?</p> <p>14 A. Sure, I don't remember. I might remember</p> <p>15 incorrectly. There are a thousand reasons why you could</p> <p>16 testify incorrectly rather than untruthfully. You know</p> <p>17 that. Particularly if you are testifying in sometimes</p> <p>18 simultaneously five cases, six cases.</p> <p>19 Q. Okay. If you testified incorrectly, you'd</p> <p>20 fix the mistake, right?</p> <p>21 A. When it is called to my attention, of</p> <p>22 course.</p> <p>23 Q. Okay. And if you filed something in court</p> <p>24 that was inaccurate in any way, you'd fix the mistake?</p> <p>25 A. Again, if it was called to my attention.</p>	<p>Page 17</p> <p>1 don't understand what I'm talking about, please just ask</p> <p>2 me to clarify.</p> <p>3 A. I will.</p> <p>4 Q. Okay. I'm going to hand you and mark as</p> <p>5 Giuliani Deposition Exhibit 1, a set of pretrial</p> <p>6 disclosures that were served on plaintiffs by your</p> <p>7 counsel in this litigation.</p> <p>8 MR. NATHAN: Is this...</p> <p>9 (Giuliani Exhibit 1, Defendant Rudolph</p> <p>10 W. Giuliani's Pretrial Disclosures, was marked for</p> <p>11 identification.)</p> <p>12 MR. CAMMARATA: Thank you.</p> <p>13 BY MR. NATHAN:</p> <p>14 Q. Do you recognize this as a document served</p> <p>15 in this litigation?</p> <p>16 A. I do.</p> <p>17 Q. And you see that on the front page it has</p> <p>18 two docket numbers up in the case caption?</p> <p>19 A. I do.</p> <p>20 Q. Okay. It has both the docket numbers for</p> <p>21 the 24-civil-6563 matter and the docket number for the</p> <p>22 24--</p> <p>23 A. I see two, yes.</p> <p>24 Q. -- mc-353 matter. Okay.</p> <p>25 And you see that in Roman Numeral I</p>

5 (Pages 14 - 17)

<p style="text-align: right;">Page 18</p> <p>1 starting on page 1 of this document, you've listed the 2 following potential trial witnesses for your -- that you 3 may offer at trial in this matter?</p> <p>4 A. Is that on page 1?</p> <p>5 Q. Page 1 and it continues on to page 3.</p> <p>6 A. I see that, yes.</p> <p>7 Q. Okay. Did you review this document before 8 it was served?</p> <p>9 A. I did.</p> <p>10 Q. Okay. Did you review it -- okay. I would 11 like to review with you the witnesses that you plan to 12 call in this matter. Are these all of the witnesses that 13 you may offer at trial in -- well, strike that.</p> <p>14 When I talk about this litigation, unless I 15 specify, will you understand that I'm just talking about 16 the trial -- excuse me. Strike that.</p> <p>17 Are these all of the witnesses that you 18 intend to rely on at trial in either of the matters that 19 are scheduled for trial in January?</p> <p>20 A. I'm sorry?</p> <p>21 Q. Excuse me. Are these all of the witnesses 22 that you intend --</p> <p>23 A. I don't know.</p> <p>24 Q. You don't know whether these are all the 25 witnesses that you intend --</p>	<p style="text-align: right;">Page 20</p> <p>1 A. Yes, she owns part of the business and 2 she's in charge of it.</p> <p>3 Q. Okay. When you say "partner," do you mean 4 business partner?</p> <p>5 A. Yes, I do.</p> <p>6 Q. Okay. How long have you known her?</p> <p>7 A. Since, well, 2017. I guess -- it would be 8 seven years.</p> <p>9 Q. How often do you speak to Maria Ryan?</p> <p>10 A. Pretty close to every day but not 11 necessarily every day.</p> <p>12 Q. Okay. How do you communicate with her?</p> <p>13 A. In person, on the phone mostly.</p> <p>14 Q. Okay. Do you ever exchange emails with 15 her?</p> <p>16 A. Yes.</p> <p>17 Q. And when you speak to her or communicate 18 with her, what do you talk about?</p> <p>19 A. Beyond this case?</p> <p>20 Q. Yeah.</p> <p>21 A. Everything. The way you would with any 22 business partner.</p> <p>23 Q. Okay. And you speak with her about --</p> <p>24 A. From who won the latest football game to 25 what the weather is to how our families are doing. I</p>
<p style="text-align: right;">Page 19</p> <p>1 (Simultaneously speaking.)</p> <p>2 THE WITNESS: I'm not preparing for trial.</p> <p>3 My lawyers are.</p> <p>4 BY MR. NATHAN:</p> <p>5 Q. Okay. You told me just now that you 6 reviewed this document before it was served.</p> <p>7 A. I did.</p> <p>8 Q. Okay. And did you see that it says that 9 these are the potential trial witnesses for your case in 10 this matter?</p> <p>11 A. As of that date.</p> <p>12 Q. As of that date. Okay. Let's go to the 13 first witness. I see you've listed yourself, Rudolph W. 14 Giuliani?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Okay. The next witness is Maria Ryan?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Who is Maria Ryan?</p> <p>19 A. Maria Ryan is my part- -- I consider her my 20 partner. She is technically the president of Standard 21 which is the company, and the CEO, I believe. She runs 22 it would be the best way to describe it. And she is in 23 charge of -- she's in charge of my business.</p> <p>24 Q. When you say "partner" -- excuse me. 25 Continue.</p>	<p style="text-align: right;">Page 21</p> <p>1 mean, many things that have nothing to do with this case.</p> <p>2 Q. But you also speak to her about issues that 3 have to do with this case?</p> <p>4 A. Sure, yes, as part of everything else.</p> <p>5 Q. Okay. Aside from her role at Standard USA, 6 LLC, what other business roles has she helped for you in 7 the past five years?</p> <p>8 A. Well, she was president of my prior 9 company, Giuliani Communications. She worked with me as 10 a -- she did work for -- when I had it, Giuliani Safety 11 and Security. That was consulting work.</p> <p>12 She worked with me on the -- assisted me on 13 the representation of the president in the -- in the 14 litigation regarding the 2020 election. Probably other 15 roles too.</p> <p>16 We have done many things together as 17 partners. We cohosted a radio show for three years on 18 WABC Radio, maybe four years, I don't remember. And 19 we've cohosted specials on television and on radio.</p> <p>20 Q. Okay. In any of her roles in connection 21 with your companies, did Ms. Ryan -- or Dr. Ryan, excuse 22 me, have access to your email?</p> <p>23 A. Yes.</p> <p>24 Q. For what purpose?</p> <p>25 A. To look at it for messages, to sometimes do</p>

6 (Pages 18 - 21)

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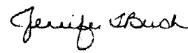
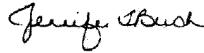
<p style="text-align: right;">Page 22</p> <p>1 a message for me. I get my email and the social media  2 confused. But sometimes I'll ask her to do it. Like if  3 I'm going to do a communication on X or -- I might ask  4 her to do it.</p> <p>5 (Reporter asks for clarification.)</p> <p>6 THE WITNESS: On X, formerly known as  7 Twitter. Or any of the others.</p> <p>8 BY MR. NATHAN:</p> <p>9 Q. Would you say that was a regular practice  10 that she --</p> <p>11 A. Yeah, it's a regular practice with her and  12 with Ted Goodman and the people who came before them.</p> <p>13 Q. Does Dr. Ryan -- has Dr. Ryan also had  14 access to your phone?</p> <p>15 A. I'm not sure I understand the question.</p> <p>16 MR. CAMMARATA: Objection.</p> <p>17 BY MR. NATHAN:</p> <p>18 Q. Do you have a cell phone?</p> <p>19 A. I do.</p> <p>20 Q. Do you have more than one cell phone?</p> <p>21 A. I do.</p> <p>22 Q. And does she have access to those phones?</p> <p>23 A. She has access -- I have some cell phones  24 that are not operative, so nobody has access to them,  25 including me.</p>	<p>1 to?</p> <p>2 A. Well, I just have -- I just have one that  3 I -- that I use. I have some dormant ones but I never  4 use them.</p> <p>5 Q. Which is the one that you use?</p> <p>6 MR. CAMMARATA: Objection.</p> <p>7 THE WITNESS: I'm not going to --</p> <p>8 MR. CAMMARATA: I believe we have --</p> <p>9 BY MR. NATHAN:</p> <p>10 Q. You can answer.</p> <p>11 MR. CAMMARATA: I believe we have a  12 protective order with that information.</p> <p>13 BY MR. NATHAN:</p> <p>14 Q. You can answer.</p> <p>15 A. I'm -- instruction by counsel, I'm not  16 going to answer.</p> <p>17 MR. CAMMARATA: You can answer the question  18 as to one email.</p> <p>19 THE WITNESS: Well, I do have an email.</p> <p>20 MR. CAMMARATA: That email.</p> <p>21 THE WITNESS: I have one email -- I have  22 one email that I know of that I use. I've had  23 many emails over the years but I don't use them  24 anymore.</p> <p>25</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. How many operative cell phones do you have?</p> <p>2 A. Well, I have two really and then I have a  3 third one that's used for the purpose of calling in my  4 show, and only that.</p> <p>5 Q. Okay.</p> <p>6 A. So if you were to make a call into my show,  7 you would use that number and it is an old iPhone that's  8 dedicated to that. So everybody has access to that,  9 probably Ted Goodman has most access to that. But nobody  10 calls me on that.</p> <p>11 Then I have an iPhone, that is the main  12 iPhone that I use for business mostly, because 24 hours a  13 day is mostly business, but also I would use it for  14 personal. I would call my children or -- then I have a  15 third cell phone that is used just for videoing, to  16 dedicated -- it's almost -- you almost consider it a  17 camera.</p> <p>18 But since it has a phone number, somehow  19 people discover it and you get some phone calls on it. I  20 prefer not to because it would interrupt a broadcast.</p> <p>21 So I have two operative cell phones and  22 third, a potentially operative, but I never use it.</p> <p>23 Q. You told me just a moment ago that Dr. Ryan  24 has access to your email accounts.</p> <p>25 Which email accounts does she have access</p>	<p style="text-align: right;">Page 25</p> <p>1 BY MR. NATHAN:</p> <p>2 Q. Which is the email that you use?</p> <p>3 A. I'm not -- I'm not going to disclose that.</p> <p>4 Q. Is it <a href="mailto:truthandjusticeforyou@protonmail.com">truthandjusticeforyou@protonmail.com</a>?</p> <p>5 A. I'm not going to disclose it.</p> <p>6 Q. Okay. Are you following your attorney's  7 instruction not to answer that question?</p> <p>8 A. Yes, I -- yes.</p> <p>9 Q. Okay. And --</p> <p>10 MR. CAMMARATA: Take a break. There is no  11 question pending.</p> <p>12 BY MR. NATHAN:</p> <p>13 Q. On -- on what basis are you declining to  14 answer the question?</p> <p>15 A. It could change -- 99 percent of it  16 contains matters that have nothing to do with this case  17 and a lot of them are privileged. A lot of them are  18 personal and it would seem to me that it constitutes  19 overbroad discovery, prying into things -- using this  20 litigation for the purpose of prying into things that are  21 frankly none of your business, that have been utilized in  22 the past for leaking, for giving information to other  23 people, so I don't give my email out generally anyway. I  24 give it out to people that I believe will use it for a  25 proper purpose.</p>

7 (Pages 22 - 25)

<p>1           MR. CAMMARATA: Can you repeat the 2        question -- 3           MR. NATHAN: Yes. 4           MR. CAMMARATA: -- as to the email? 5 BY MR. NATHAN: 6        Q. What email address -- what is the address 7 of the email account that you currently use? 8        A. I will -- I will -- no, will not disclose 9 it. 10          MR. CAMMARATA: Hold on. Can I do a 11 follow-up question? 12          MR. NATHAN: Are you objecting? 13          MR. CAMMARATA: Can I do a follow-up 14 question? 15          MR. NATHAN: Are you objecting to the 16 question? 17          MR. CAMMARATA: I'm objecting to the 18 question. 19          MR. NATHAN: What's the basis of the 20 objection? 21          MR. CAMMARATA: Can you repeat the 22 question? 23          MR. NATHAN: What is the address of the 24 email account that you use? 25          MR. CAMMARATA: Is it the -- I'm objecting</p>	Page 26	<p>1        right now? 2           MR. NATHAN: Okay. If you are -- if you 3 are going to refuse to answer this question, then 4 at the end of our time here today, I'll hold the 5 deposition open to ensure that we have an 6 opportunity to get your answer but I'll move on 7 right now. 8           MR. CAMMARATA: Okay. 9 BY MR. NATHAN: 10          Q. You described two phone numbers on cell 11 phones that are operative. 12          You described one that you use only for 13 video and I'd like to know now, because we were 14 discussing Dr. Ryan, does Dr. Ryan have access to the two 15 cell phones that you use for placing phone calls? 16          A. She has access to it, yes. 17          Q. Okay. She knows the password to each 18 phone? 19          A. I believe she does. You would have to ask 20 her but I believe she does. 21          Q. Okay. Do you maintain an electronic 22 calendar? 23          A. Not really, no. 24          Q. Do you maintain a physical calendar? 25          A. Not in any organized sense, no.</p>	Page 28
<p>1        to the -- 2          (Simultaneously speaking.) 3          MR. CAMMARATA: I'm objecting to the 4 question but is it the email address that -- you 5 have to be more specific. Is it the email address 6 he communicated with your office? 7          MR. NATHAN: The question is for the 8 witness and you can object if you'd like. But the 9 witness is going to need to answer the question. 10          MR. CAMMARATA: You can answer the 11 question. You can answer that question. 12 BY MR. NATHAN: 13          Q. The question is: What is the address of 14 the email account that you used? 15          A. I will not disclose that. 16          Q. Okay. 17          MR. NATHAN: The only basis for the witness 18 not to answer this question would be a privilege 19 objection. 20 BY MR. NATHAN: 21          Q. Is that the objection -- is that the basis 22 for your refusal to answer this question? 23          A. I told you my basis. 24          Q. Okay. 25          MR. CAMMARATA: Is there a pending question</p>	Page 27	<p>1        to the -- 2          (Simultaneously speaking.) 3          MR. CAMMARATA: I'm objecting to the 4 question but is it the email address that -- you 5 have to be more specific. Is it the email address 6 he communicated with your office? 7          MR. NATHAN: The question is for the 8 witness and you can object if you'd like. But the 9 witness is going to need to answer the question. 10          MR. CAMMARATA: You can answer the 11 question. You can answer that question. 12 BY MR. NATHAN: 13          Q. The question is: What is the address of 14 the email account that you used? 15          A. I will not disclose that. 16          Q. Okay. 17          MR. NATHAN: The only basis for the witness 18 not to answer this question would be a privilege 19 objection. 20 BY MR. NATHAN: 21          Q. Is that the objection -- is that the basis 22 for your refusal to answer this question? 23          A. I told you my basis. 24          Q. Okay. 25          MR. CAMMARATA: Is there a pending question</p>	Page 29

<p>1 to?</p> <p>2 A. Yes, sir, and the one before it, the one --</p> <p>3 Q. The one before that was Giuliani</p> <p>4 Communications LLC.</p> <p>5 And so Dr. Ryan would have had access to</p> <p>6 Giuliani Communications' accounts as well?</p> <p>7 A. I'm not sure from the beginning but most of</p> <p>8 the time, yes.</p> <p>9 Q. Okay. Throughout the year 2024, would she</p> <p>10 have had access to the Giuliani Communications business</p> <p>11 account?</p> <p>12 A. This year.</p> <p>13 Q. This year?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Does she also handle any -- strike</p> <p>16 that.</p> <p>17 Does Dr. Ryan assist you with any of your</p> <p>18 personal financial affairs?</p> <p>19 A. She does.</p> <p>20 Q. Okay. How does she do that? What type of</p> <p>21 assistance does she provide for your personal financial</p> <p>22 affairs?</p> <p>23 A. She gives me advice about them, about it</p> <p>24 and then helps me to organize it.</p> <p>25 Q. Does she help you manage financial issues?</p>	<p>Page 30</p> <p>1 Q. How long --</p> <p>2 A. Joseph Ricci.</p> <p>3 Q. How long has Joseph Ricci been your</p> <p>4 accountant?</p> <p>5 A. Oh, he's been the accountant for the</p> <p>6 businesses, I think, from the beginning. So that's 20 --</p> <p>7 20 -- most of 24 years, he's been an accountant for the</p> <p>8 business. He also participated in preparing our tax</p> <p>9 returns and things like that.</p> <p>10 Q. How long has he helped -- how long has he</p> <p>11 been your personal accountant?</p> <p>12 A. For about a year and a half or two years.</p> <p>13 Q. Okay. Did he assist you with filing of</p> <p>14 your tax returns for the tax year 2023?</p> <p>15 A. Yes.</p> <p>16 Q. Did he assist you in filing your personal</p> <p>17 tax returns for the tax year 2022?</p> <p>18 A. Yes, but he's assisted me for the filing of</p> <p>19 my tax returns for the last approximately 20 years. But</p> <p>20 it was -- there was another principal accountant who</p> <p>21 actually did it.</p> <p>22 Q. Who was that?</p> <p>23 A. That was Bob Gilbert for the longest time,</p> <p>24 and then his assistant, and then the company whose name</p> <p>25 escapes me. Gosh, I don't know. I can't remember right</p>
<p>1 A. Yes.</p> <p>2 Q. How does she --</p> <p>3 A. The way my -- anywhere from a way a</p> <p>4 secretary, a personal secretary would, to the way in</p> <p>5 which a financial advisor for Merrill Lynch would --</p> <p>6 Q. So --</p> <p>7 A. -- or from the -- from the...</p> <p>8 Q. -- she helps -- she assists you with</p> <p>9 financial trans- -- she assists you with executing</p> <p>10 financial transactions?</p> <p>11 A. Yes, but that's been true in my life for</p> <p>12 25 years, that somebody does that.</p> <p>13 Q. And for the -- for how long has Dr. Ryan</p> <p>14 played that role for you?</p> <p>15 A. I'd have to go back. Not at the beginning,</p> <p>16 somewhere along the way. When I first met her, I had a</p> <p>17 secretary, a personal secretary, and a special assistant</p> <p>18 and they all did that. Over time, that became less. Her</p> <p>19 role became more. So it's hard to say. So it evolved.</p> <p>20 Q. Okay. This year --</p> <p>21 A. Oh, I -- also, I have an accountant,</p> <p>22 changed accountants, but I've had an accountant all --</p> <p>23 two of them actually, now one.</p> <p>24 Q. Who is your accountant now?</p> <p>25 A. Joe Ricci --</p>	<p>Page 31</p> <p>1 now.</p> <p>2 MR. CAMMARATA: Don't guess.</p> <p>3 THE WITNESS: If I took a break and checked</p> <p>4 my records, I could get you the name.</p> <p>5 BY MR. NATHAN:</p> <p>6 Q. Okay. We can come back to that. When did</p> <p>7 Joe Ricci become your sole personal accountant?</p> <p>8 A. Well, certainly for the 2023 year. He's</p> <p>9 taken over more and more of that role for the last three</p> <p>10 years. Now he is, and he was for the last year.</p> <p>11 Q. And when we talk about the 2023 year,</p> <p>12 that's the filing season that extends into 2024, is</p> <p>13 that -- am I correct?</p> <p>14 A. Yes.</p> <p>15 Q. Okay.</p> <p>16 A. But it might have been sometime in 2023.</p> <p>17 Q. In the calendar year 2023 --</p> <p>18 A. Yes. Right, right.</p> <p>19 Q. -- as opposed to tax year. Excuse me. All</p> <p>20 right.</p> <p>21 And did Dr. Ryan also assist you in</p> <p>22 preparing your personal taxes?</p> <p>23 MR. CAMMARATA: Objection.</p> <p>24 BY MR. NATHAN:</p> <p>25 Q. You can answer.</p>

<p style="text-align: right;">Page 34</p> <p>1 A. Answer? To some degree. She played some 2 role, not -- I mean, in the way a number of people did. 3 Q. When you say, "she played some role," can 4 you describe the role that she played? 5 A. Well, she would get information that he 6 needed or wanted, as would others. 7 Q. Okay. And what would she do with that 8 information? 9 A. Give it to him. 10 Q. How do you think -- excuse me. How did she 11 give it to him? 12 A. Mostly mailing it. 13 Q. Mailing it. Did Dr. Ryan ever communicate 14 with Mr. Ricci by email? 15 MR. CAMMARATA: Objection. 16 THE WITNESS: You'd have to ask her that. 17 You'd have to ask her that. 18 BY MR. NATHAN: 19 Q. Did you ever communicate with Mr. Ricci by 20 email? 21 A. Probably but not often. 22 Q. Would Mr. Ricci send you emails? 23 A. I'm sure he did. I don't -- I -- 24 Q. Okay. 25 A. I don't -- I just don't remember a specific</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. What would have been a reason for her to 2 travel with you? 3 MR. CAMMARATA: Objection. 4 THE WITNESS: Oh, that I was going to 5 give -- I think of the most recent, I was going to 6 give a speech in Oklahoma to a group of people 7 that invited me to speak to them. 8 I do a certain amount of speaking, 9 sometimes get paid for it. You know, at one time 10 I used to do 150 a year. Now I do a lot fewer but 11 I still do speaking. I'm a paid speaker. 12 I also speak for charitable purposes or for 13 political purposes. So it would depend on the 14 speech. 15 She -- at this point, she and/or Ted 16 Goodman would accompany me on those speeches 17 recently. There -- different people have played 18 that role over the last 20 years. 19 BY MR. NATHAN: 20 Q. Okay. In any of Dr. Ryan's roles, have you 21 paid her? 22 A. The business has paid her. 23 Q. How much? 24 A. You want a salary? I'm not sure. 25 Q. You don't know how much your business has</p>
<p style="text-align: right;">Page 35</p> <p>1 one right now. 2 Q. Okay. Returning to Dr. Ryan's role in your 3 personal financial affairs. In the -- in terms of the 4 access she had to your financial accounts, did she need 5 your approval to make financial transactions on your 6 behalf? 7 MR. CAMMARATA: Objection. 8 You can answer. 9 THE WITNESS: Yes. 10 BY MR. NATHAN: 11 Q. Okay. And how did that work? 12 A. Usually I would get on the telephone and 13 say, yes, she can complete this transaction. 14 Q. Did she have access to your credit card or 15 to any of your credit cards? 16 MR. CAMMARATA: Objection. 17 You can answer it. 18 THE WITNESS: On occasion, not regularly. 19 BY MR. NATHAN: 20 Q. Okay. Did she -- did she travel with you? 21 A. At times she -- yes. 22 Q. Okay. When would she travel with you? 23 A. Whenever she traveled with me. I don't 24 know when she would travel with me. That's a very large 25 categorical question.</p>	<p style="text-align: right;">Page 37</p> <p>1 paid her? 2 A. I would have to be approximating. 3 Q. Okay. Does she draw a salary from each of 4 your businesses? 5 A. Pardon me? 6 MR. CAMMARATA: Objection. 7 BY MR. NATHAN: 8 Q. Does she draw a salary from each of your 9 businesses? 10 A. I believe she -- I believe that she and Ted 11 and Mike are paid through Standard, from one place. 12 Q. Okay. And when Giuliani Communications -- 13 during the period when Giuliani Communications was the 14 entity that operated -- excuse me, strike that. 15 How long has Standard been in existence? 16 A. Briefly. Six months. I'm guessing. 17 Q. Okay. And during that time, Dr. Ryan has 18 drawn a salary from Standard USA? 19 A. I mean, I don't -- Ryan Medrano would know 20 the answer. He makes out all the checks, including mine. 21 Q. Prior to Standard USA, how was Dr. Ryan 22 paid? 23 A. Pardon me? 24 Q. Before Standard USA existed, how was 25 Dr. Ryan paid?</p>

<p>1 company?</p> <p>2 A. They are both employees and owners.</p> <p>3 Q. Okay. Ted and Maria are owners of</p> <p>4 Standard?</p> <p>5 A. Right.</p> <p>6 Q. Are there any other --</p> <p>7 A. No, Mike is just --</p> <p>8 Q. -- employees of Standard?</p> <p>9 A. -- an employee and Steven Schumacher is</p> <p>10 a -- and -- and Ryan gets paid a salary. And Steve --</p> <p>11 Steven Schumacher is -- which I guess you have to --</p> <p>12 employed him as a consultant one or two times.</p> <p>13 Q. Okay. But there is nobody else who you</p> <p>14 describe as the talent with respect to either of these</p> <p>15 companies?</p> <p>16 MR. CAMMARATA: Objection.</p> <p>17 THE WITNESS: No.</p> <p>18 BY MR. NATHAN:</p> <p>19 Q. Okay. Okay. Is there anything else -- I</p> <p>20 know I asked this earlier but now that we're coming to</p> <p>21 the end, is there anything else about your testimony that</p> <p>22 you'd like to amend in any way?</p> <p>23 A. No, sir.</p> <p>24 Q. Okay. So of all the topics we've</p> <p>25 discussed, you've answered my questions to the best of</p>	Page 342	<p>1 CERTIFICATE OF OATH OF WITNESS</p> <p>2</p> <p>3 STATE OF FLORIDA )</p> <p>4 COUNTY OF ST. LUCIE )</p> <p>5</p> <p>6 I, the undersigned Notary Public, in and</p> <p>7 for the State of Florida, hereby certify that RUDOLPH W.</p> <p>8 GIULIANI personally appeared before me, produced ID and</p> <p>9 was duly sworn.</p> <p>10</p> <p>11 WITNESS MY HAND and official seal in the</p> <p>12 City of Fort Pierce, County of St. Lucie, State of</p> <p>13 Florida this December 30, 2024.</p> <p>14</p> <p>15</p> <p>16</p> <p>17 </p> <p>18</p> <p>19 Jennifer L. Bush, RPR, FPR, FPR-C</p> <p>20 Notary Public</p> <p>State of Florida at Large.</p> <p>21 My Commission: #HH 529563</p> <p>22 My commission expires: 9/20/28</p> <p>23</p> <p>24</p> <p>25</p>	Page 344
<p>1 your knowledge at this time?</p> <p>2 A. I have.</p> <p>3 Q. Okay. And nothing has occurred to you</p> <p>4 while we've sit -- while we've been sitting here that</p> <p>5 would cause you to amend any of your answers?</p> <p>6 A. No, nothing comes to mind.</p> <p>7 MR. NATHAN: Okay. I'm going to hold the</p> <p>8 deposition open for the reasons already stated on</p> <p>9 the record.</p> <p>10 And other than that, I have no further</p> <p>11 questions.</p> <p>12 THE WITNESS: Thank you.</p> <p>13 MR. CAMMARATA: Thank you.</p> <p>14 THE VIDEOGRAPHER: The time is 5:28 p.m.</p> <p>15 This concludes today's proceedings and the</p> <p>16 deposition of Rudolph W. Giuliani.</p> <p>17 (The proceeding is adjourned at 5:28 p.m.)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	Page 343	<p>1 CERTIFICATE OF REPORTER</p> <p>2</p> <p>3 STATE OF FLORIDA )</p> <p>4 COUNTY OF ST. LUCIE )</p> <p>5 I, Jennifer L. Bush, Registered</p> <p>6 Professional Reporter, Florida Professional Reporter, do</p> <p>7 hereby certify that I was authorized to and did</p> <p>8 stenographically report the deposition of RUDOLPH W.</p> <p>9 GIULIANI; and that a review of the transcript was</p> <p>10 requested; and that pages 1 through 348, inclusive, are a</p> <p>11 true record of my stenographic notes.</p> <p>12 I further certify that I am not a relative,</p> <p>13 employee, attorney or counsel of any of the parties, nor</p> <p>14 am I a relative or employee of any of the parties,</p> <p>15 attorneys or counsel connected with the action, nor am I</p> <p>16 financially interested in the action.</p> <p>17</p> <p>18 Dated this December 30, 2024.</p> <p>19 </p> <p>20</p> <p>21 Jennifer Bush, RPR, FPR, FPR-C</p> <p>22</p> <p>23</p> <p>24 The foregoing certification of the</p> <p>25 transcript does not apply to any reproduction of the same</p> <p>by and means unless under the direct control and/or</p> <p>direction of the certifying reporter.</p>	Page 345